**HCD Comments on 10.1.09 RTP Guidelines Draft** *(10.13.09)*

➢ Several sections of the draft include redundant material which could be consolidated – and can be cross-referenced where appropriate:
  - The explanation of SB 375 and background material should be in the introductory chapter; unique information from Sec. 4.40 – 4.41 for example should be moved and need not be repeated
  - These sections include related material – Sec. 2.6 Coordination with other planning processes and Sections 4.10-4.18 on RTP Consultation/Coordination (some of which also overlaps SCS)
  - SCS descriptions are several places, i.e., pgs. 24-25, Sec. 1.8, Sec. 4.1 pg. 61, Sec. 4.41, pg. 113-119.  (*Proposed language relating to RHNA or housing element, including any recommended revisions to pgs. 116-117 re housing incorporating changes from SB 575 yet pending*)

➢ There should be some guidance on RTP provisions addressing equity, civil rights issues, environmental justice issues, including consideration of benefits and burdens borne by different socio-economic population segments (beyond only item g. of the modeling section on pg. 56).

Pg. 26: re: Submitting SCS/APS to ARB for review:  the description of potential revision of the SCS should clarify that, since ARB review of an SCS occurs after adoption of the RTP, revision of the SCs would require amendment of the RTP.  The procedural or timing implications of this relative to meeting the RTP adoption due date before expiration of its federal conformity findings should be noted (e.g., how much additional time would an MPO have to allow at a minimum to allow for amending its newly adopted RTP and yet meet its 4 yr. adoption due date)?  Is this prospect realistic?

Pg. 27 re RTP Update Cycle:  It would be useful to include the CFR citation for what the trigger date is for the four-year update for non-attainment MPOs so as not to have a conformity lapse.

Pgs. 32-33 re Land Use Strategies:   The second par.  Should read " . . . the MPOs to adopt RTPs or APS' which meet targets reducing GHG emissions . . . "  and the itemized list that follows should be revised and clarified . . .i.e., #1 -- should not mix statutory requirements such as the housing projections for the RTP planning horizon with voluntary options such as regional blueprint plans such that it is unclear which is required, and which is voluntary; #2 & #6 in particular are confusing. . .  as regional blueprints were to configure more beneficial development patterns that existing development patterns, they are not necessarily consistent with current general plans.

Pg. 33: re: Performance Measure #2:   This is a potentially problematic recommendation, and needs revision for clarification:
a) what is considered to constitute a "project(s) identified in the RTP"?  - presumably projects limited to transportation investments required to be identified or transit priority projects which are to qualify for the CEQA streamlining benefits?
b) as written it implies that projects listed in the RTP must be consistent with existing general plans, while that may not always be the case – particularly for project assumptions that may be attributed to or related to the RTP planning horizon extending beyond the planning period covered by most general plans.

Pgs. 33-34 re Land Use Assumptions:  This section needs to be rewritten, as it confuses the relationship of land use assumptions and growth forecasts – regional population and economic forecasts should drive modeling assumptions about land use assumptions, not the reverse.  Types of uses (Residential,

commercial, mixed use, etc) and capacity (e.g. population and employment density) and their distribution are examples of land use assumptions.

Pg. 34 Best Practices, first sentence, line 2: replace "preclude" with "precede."

Sec. 2.6. pg. 37: This section should identify the Regional Housing Needs Allocation Process as a key process the RTP updates must be coordinated with (proposed language being developed).

Sec. 2.7, pg. 39: Perhaps something similar to the RHNA-RTP process chart developed by HCD would be appropriate here?

Sec. 3.0, pg. 44, par. 7: What are *interpersonal* household constraints (type perhaps)?

Pg. 75, par. 3: add "Housing" to the examples of (subject) areas listed for consultation.